

DECLARATION OF RODOLFO DELGADO

I, Rodolfo Delgado, hereby declare the following pursuant to 28 U.S.C. § 1746. I am of sound mind, and I sign this declaration voluntarily and without pressure from any person, admitting freely that this is the truth. I sign the declaration so that the truth can be recorded in writing:

1. I am the same person charged as a defendant in the case styled *United States v. Rodolfo Rudy Delgado*, Cause No. 18-CR-115, pending the Houston Division of the Southern District of Texas.

2. I reside in McAllen, Texas, with my wife.

3. My lawyer and I would want to call at least fifteen witnesses on my behalf during the trial of my case. Concerning these witnesses, they all reside and work in the McAllen area. I do not have the financial ability to pay any expenses for these witnesses to travel to Houston for testimony, nor to sustain these witnesses during the extended trial.

4. It is my understanding that the witnesses cannot leave McAllen, Texas, for an extended period of time as they each have to work and/or support their families. It would cause an extreme hardship on such witnesses to leave their respective families and workplaces to travel to Houston, as such travel would most likely take, at a minimum, three days out of each of their schedules, given the 12-hour round trip between the two cities. And this estimate assumes the time and day of each of their testimony could be predicted with any certainty.

5. I have been told by many family and friends that they are willing and available to provide support to me during trial. They all live in the McAllen/Edinburg area. Because of the age, work responsibilities and/or income levels of my family members, as briefly described

below, it would cause a significant hardship for my family members to offer me support if trial were to be held in Houston:

a. My oldest brother Robert is 80 years old and a retired school teacher. He lives in Edinburg.

b. My brother Mauro is 73 years old and a retired truck driver. He lives in Edinburg.

c. My brother Juan is 68 years old and still works for a nursing home. He lives in Edinburg.

d. My brother Luis Jr. is 63 years old and is a family practice medical doctor. He lives in McAllen and his clinic is in McAllen.

e. My sister Margarita is 78 years old and is a widow living on Social Security in Edinburg.

f. My sister Hermila is 71 years old, is retired, and living in Edinburg.

g. My sister Rachel is 60 years old, and works a law office in McAllen. She lives in Edinburg.

h. My youngest sister Gloria is 58 years old and lives and works in Edinburg.

i. All of my brothers and sisters have grown children and grandchildren, all of who live in the McAllen/Edinburg area. It would be an extreme hardship for them to travel to Houston during my trial.

6. Without the witnesses that I want to call on my behalf during trial, I will not have the ability to adequately defend myself against the Government's accusations.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Date: August 9, 2018


Rodolfo Rudy Delgado